



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AA:mss
F. #2022R00315

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 20, 2023

By ECF

Jeremy L. Gutman
521 Fifth Avenue, 17th Floor
New York, NY 10175
212-644-5200
jgutman@jeremygutman.com

Robert Michael Appleton
Olshan, Frome & Wolosky LLC
1325 Avenue of the Americas
Ste 15th Floor
New York, NY 10036
212-451-2288
rappleton@olshanlaw.com

Re: United States v. Sagar Singh, et al.
Criminal Docket No. 23-236 (FB)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The discovery has been uploaded to USAFx. The discovery supplements the government's production on August 18, 2023. The government also requests reciprocal discovery from the defendant. In addition, the government has marked certain records as Sensitive Discovery Material, consistent with the Stipulation and Protective Order entered into on July 24, 2023. See ECF No. 28.

I. The Government's Discovery

Bates Numbers	Description
VILE_0000000228	Records from Apple – SENSITIVE DISCOVERY
VILE_0000000229	Records from AT&T - SENSITIVE DISCOVERY
VILE_0000000230	Records from Bandwidth

Bates Numbers	Description
VILE_0000000231	Records from Bank of America
VILE_0000000232	Records from Bitpay - SENSITIVE DISCOVERY
VILE_0000000233	Records from Block, Inc. - SENSITIVE DISCOVERY
VILE_0000000234	Records from Charter - SENSITIVE DISCOVERY
VILE_0000000235	Records from Cloudflare - SENSITIVE DISCOVERY
VILE_0000000236	Records from Coinbase - SENSITIVE DISCOVERY
VILE_0000000237	Records from Comcast - SENSITIVE DISCOVERY
VILE_0000000238	Records from Digital Ocean - SENSITIVE DISCOVERY
VILE_0000000239	Records from Discord - SENSITIVE DISCOVERY
VILE_0000000240	Records from Facebook - SENSITIVE DISCOVERY
VILE_0000000241	Records from Geico - SENSITIVE DISCOVERY
VILE_0000000242	Records from Github
VILE_0000000243	Records from Google - SENSITIVE DISCOVERY
VILE_0000000244	Records from iDotz
VILE_0000000245	Records from Microsoft - SENSITIVE DISCOVERY
VILE_0000000246	Records from Name Cheap - SENSITIVE DISCOVERY
VILE_0000000247	Records from Oath Holdings aka Yahoo - SENSITIVE DISCOVERY
VILE_0000000248	Records from Paxful - SENSITIVE DISCOVERY
VILE_0000000249	Records from PayPal - SENSITIVE DISCOVERY
VILE_0000000250	Records from Proton - SENSITIVE DISCOVERY
VILE_0000000251	Records from Reliable Site
VILE_0000000252	Records from Roobet
VILE_0000000253	Records from Snapchat - SENSITIVE DISCOVERY
VILE_0000000254	Records from TD Bank
VILE_0000000255	Records from T-Mobile - SENSITIVE DISCOVERY
VILE_0000000256	Records from Toon Town - SENSITIVE DISCOVERY
VILE_0000000257	Records from Twitter - SENSITIVE DISCOVERY
VILE_0000000258	Records from Vultr - SENSITIVE DISCOVERY
VILE_0000000259	Records from Windstream - SENSITIVE DISCOVERY
VILE_0000000260	Records from Yahoo - SENSITIVE DISCOVERY
VILE_0000000261	Records from Amazon - SENSITIVE DISCOVERY
VILE_0000000262	Records from Cox - SENSITIVE DISCOVERY
VILE_0000000263	Records from Fixed Float
VILE_0000000264	Records from Gitlab
VILE_0000000265	Records from Let's Encrypt - SENSITIVE DISCOVERY
VILE_0000000266	Records from Side Shift
VILE_0000000267	Records from Sound Cloud - SENSITIVE DISCOVERY
VILE_0000000268	Records from Talktone

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Adam Amir
Adam Amir
Assistant U.S. Attorney
(718) 254-6116

Enclosures

cc: Clerk of the Court (FB) (by ECF) (without enclosures)